

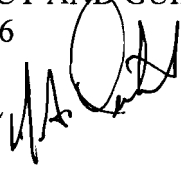


Department of Energy

Southwestern Power Administration
One West Third Street
Tulsa, Oklahoma 74103-3519

September 29, 2006

MEMORANDUM FOR THE OFFICE OF AIR, WATER AND RADIATION
PROTECTION POLICY AND GUIDELINES
(EH-41):Natoli-6-1336

FROM: MICHAEL A. DEIHL 
ADMINISTRATOR

SUBJECT: 2005 Annual Site Environmental Report

The Southwestern Power Administration Annual Site Environmental Report is attached. Southwestern has continued its efforts toward compliance with all applicable environmental regulations during CY 2005. Southwestern's success in environmental compliance is documented in the compliance status section of the report. Environmental monitoring at Southwestern facilities has not been required; therefore, no monitoring data is included in the report.

Attachments

cc:

Patrice Bubar, Formerly EH-3 (1)
Director, Office of Corporate Safety Analysis
270/Germantown Building
U.S. Department of Energy
Washington, DC 20585

Ross Natoli, EH-41 (3)
Environmental Protection Specialist
3G-089/Forrestal Building
U.S. Department of Energy
Washington, DC 20585

Glen Podonsky, HS-1 (1)
Chief Health, Safety & Security Officer Safety
270/Germantown Building
U.S. Department of Energy
Washington, DC 20585

Ray Hardwick, EH-2 (1)
Deputy Assistant Secretary for Facility
270CC-4048/Germantown Building
U.S. Department of Energy
Washington, DC 20585

Director, Office of Scientific and
Technical Information
5B-168/Forrestal Building
U.S. Department of Energy
Washington, DC 20585

Environmental Protection Agency
Region 6
1445 Ross Avenue
Suite 1200
Dallas, TX 75202-2733

SOUTHWESTERN POWER ADMINISTRATION



ANNUAL SITE ENVIRONMENTAL REPORT CY 2005

**SOUTHWESTERN POWER ADMINISTRATION
SITE ENVIRONMENTAL REPORT
FOR CALENDAR YEAR 2005**

TULSA, OKLAHOMA

JANUARY 1, 2005 - DECEMBER 31, 2005

SOUTHWESTERN POWER ADMINISTRATION
ONE WEST THIRD STREET
TULSA, OKLAHOMA 74103

TABLE OF CONTENTS

<u>EXECUTIVE SUMMARY</u>	<u>Page No.</u>
<u>INTRODUCTION</u>	1
<u>COMPLIANCE STATUS</u>	2
<u>Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)</u>	3
<u>Superfund Amendments and Reauthorization Act (SARA)</u>	3
<u>Executive Order 12856,</u>	3
<u>Section 304:</u>	3
<u>Sections 311-312:</u>	4
<u>Section 313:</u>	4
<u>Resource Conservation and Recovery Act (RCRA)</u>	4
<u>Federal Facilities Compliance Act (FFCA)</u>	4
<u>National Environmental Policy Act (NEPA)</u>	5
<u>Clean Air Act (CAA)</u>	5
<u>National Emission Standards for Hazardous Air Pollutants (NESHAPs)</u>	6
<u>Clean Water Act (CWA)/Safe Drinking Water Act (SDWA)</u>	6
<u>National Pollutant Discharge Elimination System (NPDES)</u>	7
<u>Toxic Substances Control Act (TSCA)</u>	7
<u>Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)</u>	8
<u>Endangered Species Act (ESA)</u>	8
<u>National Historic Preservation Act (NHPA)</u>	9
<u>Executive Order 11988,</u>	10
<u>Executive Order 11990,</u>	10
<u>OTHER MAJOR ENVIRONMENTAL ISSUES AND ACTIONS</u>	11
<u>SUMMARY OF PERMITS</u>	13
<u>ENVIRONMENTAL PROGRAM INFORMATION</u>	14
<u>Radiological Information</u>	14
<u>Non-Radiological Information</u>	15
<u>Groundwater Monitoring and Protection</u>	15
<u>Quality Assurance</u>	15

EXECUTIVE SUMMARY

This report provides a synopsis of Southwestern Power Administration's (Southwestern's) effectiveness in managing its operations in an environmentally responsible manner. The Office of Corporate Facilities Services maintains responsibility for development, oversight, management, and operations of the environmental programs. Senior Management at Southwestern has taken actions to increase environmental awareness throughout the organization. During CY 2005, Southwestern was not involved in any known programs or activities that had adverse impacts on the environment. Southwestern began the development of the Environmental Management System (EMS) Manual. The progress of the implementation of an Environmental Management System was reported in the Department of Energy quarterly reports. Measurable environmental objectives and targets were established as well as an ISO 14001 Awareness training program to provide information to all federal and contract employees on the standard that specifies the requirements for an Environmental Management System. The Environmental Management System (EMS) was audited in mid-2005 and gaps were corrected by December 31, 2005. Southwestern's EMS is in full-compliance with ISO 14001 standards. Southwestern continued to function throughout CY 2005 in an operations and maintenance posture with minor substation projects.

In 2005, Southwestern recycled over 25 metric tons of iron/steel, mineral oil, copper, aluminum, aluminum cans, mixed scrap metal, tires, batteries, office supplies and fluorescent bulbs. Southwestern made \$10,231 worth of purchases containing recovered content materials.

All of Southwestern's 23 substations have SPCC plans that identify measures to prevent spills from harming the environment, such as identifying the need for secondary containment at the facilities. The plans include emergency response and control procedures.

INTRODUCTION

The Southwestern Power Administration (Southwestern) is a Power Marketing Agency of the DOE created in 1943. Southwestern markets hydroelectric power and energy produced by 24 Federal dams operated by the U.S. Army Corps of Engineers in Oklahoma, Arkansas, Missouri, and Texas. Marketing hydroelectric power and energy, and ensuring its reliable delivery constitute the core of Southwestern's program. Southwestern maintains 1,380 miles of high-voltage transmission lines and associated substations. Support for operation and maintenance of this system is provided by an area-wide microwave communications system. Southwestern's communication system interfaces with the U. S. Army Corps of Engineers microwave system. The communications system includes telemetering, supervisory control and data acquisition (SCADA), mobile radio base station control, computer data transmission, and telephone/fiber optic communications. Southwestern's facilities and the Corps of Engineers generating facilities make up the Southwestern Federal Power System. Southwestern is headquartered in Tulsa, Oklahoma, with engineering and maintenance facilities located in Springfield, Missouri; Jonesboro, Arkansas; and Gore, Oklahoma. Southwestern's Headquarters' in Tulsa provide a complete range of support functions including legal, financial, procurement, automatic data processing, engineering, power marketing, aviation, environmental, safety and health. Southwestern's legislative mandate is Section 5 of the Flood Control Act of 1944. This law requires Southwestern to give preference in sales to public bodies and Cooperatives, and to achieve widespread use of the power.

COMPLIANCE STATUS

Southwestern conducted its operations and maintenance activities during the calendar year with few environmental impacts or issues. The most prominent environmental issues for Southwestern during CY 2005 included (1) Commencement of the Arkansas Programmatic Agreements for Cultural Resource Preservation , and (2) Achieving EMS conformance as the result of identification of gaps during an EMS audit. The following major environmental statutes and Executive Orders impacting Southwestern are discussed below:

-- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

This Act, referred to as Superfund, was designed to help ensure cleanup of inactive hazardous waste sites. CERCLA provided authorization for EPA to respond to and remedy polluted sites. Southwestern contracts with an approved electrical equipment disposal facility for the disposal and recycling of oil and the equipment carcasses. Southwestern had no CERCLA involvement in CY2005.

-- Superfund Amendments and Reauthorization Act (SARA)

This Act revised and extended CERCLA. The SARA Title III amendments contain requirements for the Emergency Planning and Community Right-to-Know Act (EPCRA). EPCRA encourages and supports emergency planning efforts at the state and local levels. Additionally, it provides public and local governments with information concerning potential chemical hazards present in their communities by requiring facilities to disclose hazardous substances they use or store. Southwestern did not surpass the threshold for the Tier I and II reporting and notification requirements.

-- Executive Order 12856, "Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements", SARA Title III, Emergency Reporting and Community Right-to-Know Act (EPCRA)

The following Summary compliance information is provided as requested:

EPCRA 302-303: Planning Notification	Yes[] No [] Not Required [x]
EPCRA 304: EHS Release Notification	Yes[] No [] Not Required [x]
EPCRA 311-312: MSDS/Chemical Inventory	Yes[] No [] Not Required [x]
EPCRA 313: TRI Reporting	Yes[] No [] Not Required [x]

Sections 302-303: These Sections are intended to ensure State and Local communities are prepared to respond to potential chemical accidents. Southwestern does not store or use extremely hazardous substances (EHS) in amounts equal to or exceeding threshold planning quantities (TPQ). Therefore, Southwestern is exempt from EPCRA emergency planning requirements.

Section 304: This Section is designated criteria under which facilities must report the release of certain substance to the environment. The reportable quantity (RQ) for each of the substances listed in either: a) list of extremely hazardous substances; or b) list of CERCLA hazardous substances. Since Southwestern did not release any of the substances in amounts exceeding the RQ, Southwestern is exempt from reporting to any SEPCs and LEPCs.

Sections 311-312: These Sections are designed to provide the public with information on hazardous chemicals in their communities by establishing certain reporting requirements. These requirements promote community awareness and facilitate emergency planning. However, Southwestern is exempt from these reporting requirements because during CY 2005 it did not have onsite for any one day: a) 10,000 lbs of hazardous chemicals; or b) the lesser of 500 lbs or the TPQ for extremely hazardous substances. Therefore, Southwestern is exempt from MSDS, Tier I, and Tier II reporting requirements. Southwestern has, however, contacted local fire departments and provided courtesy information on Southwestern's operations, as dictated by its Community Right-to-Know Program.

Section 313: This Section is intended to inform public and government officials about routine releases of toxic chemicals to the environment. Southwestern is exempt from submitting a Toxic Chemical Release Inventory Form (Form R) to the EPA and designated State officials because it: a) did not manufacture more than 25,000 lbs in CY 2005 of a listed toxic chemical; or b) process more than 25,000 lbs in CY 2005 of a listed toxic chemical; or c) otherwise use more than 10,000 lbs in CY 2005 of a listed toxic chemical.

-- Resource Conservation and Recovery Act (RCRA)

RCRA defines and regulates nonhazardous and hazardous solid wastes. Nonhazardous wastes include municipal solid waste, industrial nonhazardous wastes, commercial nonhazardous wastes, and some semi-solid and liquid wastes. These solid wastes also include special wastes such as, infectious wastes, construction wastes, household wastes, and oil and gas wastes. Hazardous wastes are defined as listed wastes (40 CFR 261) and wastes that exhibit certain characteristics of reactivity, ignitability, corrosivity, or toxicity. RCRA, later amended by the Hazardous and Solid Waste Amendments (HSWA), regulates hazardous waste operations by establishing standards for hazardous waste generation, transportation, treatment, storage, or disposal.

Southwestern has developed Waste Management, Waste Minimization, and Pollution Prevention Programs to help ensure compliance with RCRA and HSWA regulations. These programs were established and implemented to minimize the volume and toxicity of wastes; monitor the collection, transportation, processing and disposal of solid wastes; encourage recycling; assure the safety, health, and welfare of the public; and prevent pollution of the air, land, and water. Southwestern has inspected and approved a computer-recycling center for computer disposal. Southwestern's Self-Assessment and Appraisal Program indicated approximately 99 % compliance with its written environmental programs. Southwestern continues to improve its identification, characterization, quantification, and documentation of RCRA wastes streams. During CY 2005, Southwestern has continued the process of re-evaluating its temporary storage facilities to help ensure appropriate management of its wastes and protection of human health and the environment.

-- Federal Facilities Compliance Act (FFCA)

The FFCA includes explicit authority to the Administrator of the EPA to commence administrative enforcement actions against any department, agency, or instrumentality of the executive, legislative, or judicial branch of the Federal Government that is in violation of requirements under RCRA. The FFCA also allows States to assess fines against Federal facilities for RCRA violations.

Southwestern continued to maintain compliance with RCRA and FFCA during CY 2005.

-- National Environmental Policy Act (NEPA)

NEPA requires that all Federal agencies or agencies spending Federal monies, to consider the potential environmental effects of proposed actions during a proposed actions planning stages. Agencies must prepare documentation regarding these considerations; and provide recommendations for Federal actions that may significantly effect the environment. NEPA documentation includes categorical exclusions, environmental assessments, and environmental impact statements.

Southwestern maintained compliance with NEPA requirements. Nine NEPA Categorical Exclusion (CX) process reviews were conducted during CY 2005. The CX's include: Electric power marketing rate change; Routine maintenance activities for buildings, structures and right-of-way; Siting/Construction/Operation of support buildings and structures; and adding fiber optic cable to existing transmission line and burying cable in existing right-of-way.

-- Clean Air Act (CAA)

The Clean Air Act was promulgated "to protect and enhance the quality of the Nation's air resources so as to promote public health and welfare and the productive capacity of its population. The EPA is required to set National Ambient Air Quality Standards (NAAQS) that define clean air levels. The EPA set standards for six "criteria" pollutants: carbon monoxide, lead, ozone, nitrogen oxides, sulfur dioxide, and particulate matter. The EPA also established New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPs), and standards for mobile sources. NESHAPS have been established for beryllium, mercury, vinyl chloride, benzene, arsenic, asbestos, radon, and other radio nuclides. Air quality standards are achieved by the states through State Implementation Plans (SIPs). The SIPs establish emission limits and compliance schedules for pollution sources.

Southwestern has facilities in four states: Missouri, Arkansas, Texas and Oklahoma. In all states, the air pollution control regulations and individual pollutant levels apply to each facility separately, not to Southwestern operations as a whole. None of Southwestern's facilities are located in non-attainment areas. Southwestern does not have any radioactive sources used for its DOE operations and therefore, does not perform any radiation dose limit or radio nuclide monitoring. Based on the regulations and possible emission sources, Southwestern has determined, after reviewing applicable regulations and SIPs, that its facilities are not required to permit, monitor, or report air emissions.

-- National Emission Standards for Hazardous Air Pollutants (NESHAPs)

Pursuant to the Clean Air Act, the EPA established National Emission Standards for Hazardous Air Pollutants (NESHAPs). Southwestern has determined that its facilities are not required to report or permit air emissions based on a review of applicable regulations and potential emissions sources.

Southwestern's Asbestos Management Program governs its compliance with potential asbestos fiber release. Southwestern's asbestos program is in agreement with both EPA and OSHA asbestos regulations. The asbestos program requires that exposure assessments, including personal and area air monitoring, be conducted for all OSHA Class III and IV work activities performed by trained maintenance personnel, unless Southwestern can provide evidence that a work activity would have fiber releases below the permissible exposure limit of 0.1 fibers/cubic centimeter. Records of exposure assessments are retained by the Area Office Administrative Officers.

All maintenance employees receive Class IV Annual Asbestos Awareness training. Those employees who are involved in activities in which disturbance occurs, receive Class III, II and I as applicable.

-- Clean Water Act (CWA)/Safe Drinking Water Act (SDWA)

The CWA regulates the discharge of pollutants into waters of the U.S. from any point source including industrial facilities and sewage treatment facilities. The CWA also regulates storm water runoff from certain industrial sources; requires reporting and cleanup of oil and hazardous substance spills in waters of the U.S.; protects waters of the U.S.; requires a permit to adversely affect wetlands; and requires spill prevention plans for sites that store oil and other petroleum products. The EPA established a requirement to have a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of storm water from certain point sources.

The SDWA requires EPA to establish primary drinking water regulations for any contaminants that may have an adverse effect on public health. As a result, EPA developed primary drinking water maximum contaminant levels (MCLs) and secondary MCLs.

During CY 2005, Southwestern maintained compliance with both the SDWA and CWA. Southwestern maintains a Spill Prevention, Control, and Countermeasures (SPCC) plan for oil transportation activities and at each of its electrical substations. Southwestern is not regulated by Federal storm water regulations, as discussed below. Southwestern utilizes city water at its manned facilities. At six unmanned sites, there are five non-potable wells and one potable well; these are tested by the appropriate state. Southwestern has closed two of these wells and continues to consider the need for the remaining wells.

As part of a Preliminary Assessment/Site Investigation study conducted in 1993, it was determined that a full-scale groundwater monitoring program is not required to meet the objectives of Southwestern's Groundwater Protection Management Program. However, Southwestern will continue to identify existing and potential sources of groundwater

contamination. Should any information indicate that any Southwestern activities might adversely affect the groundwater, Southwestern will implement a site-specific groundwater-monitoring program.

-- National Pollutant Discharge Elimination System (NPDES)

As mentioned before the NPDES is the primary mechanism used by EPA to manage point source discharges. NPDES permits are required for the discharge of pollutants from certain point sources, categorized by SIC or NAICS codes, into waters of the U.S.

The majority of Southwestern substation facilities have not been required to apply for NPDES permits because Southwestern's activities do not involve industrial operations as defined in the regulation (40 CFR 122); and because oil is enclosed in electrical equipment and does not come into direct contact with storm water. The State of Missouri views secondary containment structures, such as oil/water separators, as wastewater treatment devices requiring such facilities to obtain a Missouri NPDES general operating permit. Facilities requiring NPDES permits have obtained the general operating permits and maintain the oil/water separators in accordance with their provisions. Annual NPDES monitoring reports are required annually for the sites with NPDES permits. There were no NPDES permits required for construction activities during CY2005. All construction projects involved land disturbance of less than 5 acres. This included areas that may have been part of a larger common plan of development or sale.

-- Toxic Substances Control Act (TSCA)

The TSCA regulations prohibit the manufacture, processing, and distribution of PCBs in commerce, except as exempted by EPA. The EPA, through the TSCA regulations, also regulates the use, marking, and disposal of PCBs. Some states, such as Arkansas, regulate PCB disposal and handling through their State RCRA Programs. The TSCA regulations also prescribe requirements for Southwestern concerns, such as, radon, lead-based paint, and asbestos.

Southwestern has an on-going program to reduce all PCB concentrations in its electrical equipment to below 50 ppm. Southwestern currently has no known equipment that contains 500 ppm or greater PCB. Southwestern strives to recycle or dispose of any PCB-contaminated equipment within 30 days of removal from service and declared excess to Southwestern's needs. The Equipment/Oil Disposal Evaluation and Data Search study provides Southwestern with specific disposal and management alternatives for its PCB contaminated electrical equipment. Facility audit criteria, developed as part of the study, are used to evaluate and select an appropriate facility (or facilities) to accept Southwestern's PCB-contaminated waste. The purpose of this effort was to limit Southwestern's long-term risk, while facilitating its disposal requirements at reasonable costs.

Federal agencies are required by the Indoor Radon Abatement Section of TSCA to conduct studies of radon levels in Federal buildings, and to provide the results to the EPA for its consolidated report to Congress. Radon is an odorless, invisible radioactive gaseous element formed in the decay of radium. Radium occurs naturally in the air, water, and soil. Congress

may provide additional requirements for Federal agencies as part of a comprehensive radon abatement program.

Southwestern previously conducted radon sampling in CY 2003. Southwestern has planned to conduct limited radon sampling at some of its field locations during CY 2006. These field locations have had previous instances of levels above the recommended concentrations. In CY2002 and CY2003, control measures were implemented which significantly reduced the level of exposure to employees.

-- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

FIFRA directs EPA to register pesticides to ensure that, when used according to label instructions, they will not present unreasonable risks to human health or the environment. Pesticides include insecticides, anti-foulants, fungicides, rodenticides, disinfectants, and plant growth regulators. Depending on pesticide properties and use patterns, pesticides can leach through soils and contaminate groundwater. This is especially true where the water table is close to the surface, and/or soils are highly permeable.

Southwestern has managed these concerns through relatively conservative means. Southwestern contracts pest management needs at its maintenance facilities through local vendors. In addition, Southwestern contracts portions of its vegetation management needs involving herbicide application on the transmission line rights-of-way (ROW). Guidance for the use of herbicides at substations; pole yards; microwave/radio sites; and along the transmission line ROW is largely governed by two environmental assessments. Certified personnel accomplish all herbicide spraying. No restricted herbicides are utilized.

A Vegetative Management Assessment was conducted in 2004 and a Vegetation Management Plan, which will conform to FERC requirements, will be developed by a Forestry Management professional, in CY2006 or CY2007.

-- Endangered Species Act (ESA)

The ESA was established to protect aquatic and land animals and plant species in danger of extinction (endangered) and those that are in danger of becoming extinct (threatened). Federal agencies are required to ensure that any of their associated actions do not adversely impact threatened or endangered species (T&E). If listed species may be affected, then the agency must consult with the U.S. Fish and Wildlife Service (USFWS), or National Marine Fisheries Wildlife Service, whichever is appropriate. State-listed species should also be considered when considering an action.

Southwestern has had few projects that would be impacted by this Act. However, a complete T&E species update survey was conducted for the system-wide vegetation management environmental assessments as well a review and update for approved chemicals for use in vegetation control. Southwestern's system-wide T&E species list are scheduled for review on a bi-annual basis. A site survey was re-conducted in April 2005 to determine the proliferation of the Missouri Bladder Pod along areas identified within Southwestern's

ROW as potential bladder-pod locations near Williams Glade in Springfield, Missouri. All Maintenance and Engineering construction projects, as well as real property transfers, are evaluated for potential adverse impacts to known T&E species. Southwestern has cooperated with the Corps of Engineers and the USFWS to manage releases from Keystone, Eufaula and Denison dams for the protection of the endangered interior least tern, a migratory shore bird that nests on sand bars and islands in the rivers downstream from those projects. The Corps' biological assessment resulted in a "may effect" determination that was confirmed in the USFWS' biological opinion issued in June 2004. The Corps and Southwestern have operated those projects in accordance with the measures prescribed in the biological opinion. The biological opinion requires the construction/enhancement of island habitat estimated to cost multiple millions of dollars a portion of which will undoubtedly be assigned to Southwestern for repayment. A population of Missouri Bladder Pods, an Endangered Plant Species located near Springfield, Missouri, was surveyed by Southwestern in 2005. It was determined that the Southwestern's routine activities in this region are causing a proliferation of the species. Southwestern maintains a close working relationship with the Missouri Department of Conservation to protect and enable growth of these plants. There were no adverse impacts identified for Southwestern actions to any other known T&E species during CY 2005.

-- National Historic Preservation Act (NHPA)

All Federal agencies, including Southwestern, have responsibilities under the National Historic Preservation Act of 1966, as amended (NHPA). Under Section 106 of the Act, all Federal agencies will take cultural resources into account during agency project planning. The intent here is to ensure that agency actions do not inadvertently disturb or destroy significant cultural resources. Cultural resources can include, but are not limited to: prehistoric and historic archaeological materials and sites located on or below the ground surface; historic structures (buildings, sites, structures, or objects) that are more than 50 years old; and cultural and natural places, and sacred objects important to a group or groups of Americans, such as Native Americans. A compliance process was established by the President's Advisory Council on Historic Preservation (36 CFR 800) that, if followed, ensures compliance with provisions of the Act. The Act and the regulations do not mandate an outcome, only that an agency considers the effects its actions may have on significant resources. Under Section 110 of the Act, each agency is required to develop and carry out a systematic program to inventory all cultural resources on lands which they own, and nominate to the National Register of Historic Places properties that meet the eligibility requirements.

The Department of Energy (DOE) has issued to all facilities and program offices, a directive and guidance to develop a Cultural Resource Management Program (CRMP). The intent is to ensure that DOE complies with the NHPA requirements. The CRMP also serves the purpose to consolidate these requirements into a single resource guide.

Southwestern began development of its CRMP to better evaluate potential project impacts to cultural, historical, or archaeological resources. Implementation of the CRMP will help Southwestern ensure compliance with the National Historic Preservation Act by integrating

these considerations into the planning process. During CY 2005, Southwestern had no actions that affected properties that were on or eligible for the National Register of Historic Places.

Southwestern streamlined the cultural resources review process during CY2004 and CY2005. The third and final of the three programmatic agreements that elucidate a revised Section 106 review process for Southwestern was negotiated and completed in April of 2005. Additionally, the CRMP was updated. A cultural resources training module is being used to train employees. A report, titled, *National Register of Historic Places Evaluations of Southwestern Power Administration Facilities in Oklahoma: Electrical Stations and Maintenance Facilities* that meets the Section 110 requirement was developed during CY2005 and CY2006 and finalized in April 2006. As per the Programmatic Agreement with Oklahoma stakeholders, this document was submitted to the Oklahoma State Historic Preservation Office and the Oklahoma Archeological Survey. Two similar studies will be conducted for Southwestern's facilities in Arkansas and Missouri during CY2006-2007.

-- Executive Order 11988, "Floodplain Management"

Southwestern had few projects that would have been impacted by this Executive Order. However, some Southwestern facilities and structures are located in or near floodplain areas. All Maintenance and Engineering construction projects, as well as real property transfers, are evaluated for potential adverse impacts to wetland areas. There were no adverse impacts to any known floodplain areas during CY 2005.

-- Executive Order 11990, "Protection of Wetlands"

This Executive Order directed federal agencies to avoid, to the extent possible, adversely impacting wetlands. This includes adverse impacts associated with the destruction or modification of wetlands, or the support (direct or indirect) of new construction in wetlands when practical alternatives exist. The EPA and the Corps of Engineers (COE) have joint administrative duties for Federal wetlands regulations. The discharge of dredges and fill materials into waters of the U.S., including some wetlands, are regulated through a permit program largely administered by the COE. Numerous State and local governments have enacted regulations for the protection of wetlands.

Southwestern has had few projects that would be impacted by this Executive Order. However, some Southwestern facilities and structures are located in or near wetland areas. All Maintenance and Engineering construction projects, as well as real property transfers, are evaluated for potential adverse impacts to wetland areas. There were no adverse impacts identified to any known wetland areas in Southwestern's system during CY 2005.

OTHER MAJOR ENVIRONMENTAL ISSUES AND ACTIONS

Southwestern's *Annual Progress Reports on Implementation of Greening the Government*. E.O. 13101 and 13148 were reported on December 30, 2005. Overall, 57% of the money spent was used to purchase recycled products. The CY 2005 results to purchase items containing recycled content – Affirmative Procurement was 100% in Construction; Non-paper office; Paper and Paper Products; and miscellaneous. The vehicular category was 0% due to the fact that Southwestern's vehicles are used off-road in rugged terrain. These recycled/reclaimed products may present a safety and performance issue under Southwestern's standard operating conditions.

-- Waste Generation

During this period Southwestern reported three types of waste (i.e.: Routine State Regulated Waste, Routine TSCA Waste, & Routine Sanitary Wastes). Provided below is brief summary of waste generated by Southwestern during CY2005 as compared to CY2004.

State Regulated

For the year 2005 Southwestern reported a 100% reduction in Routine State Regulated Waste, with a decrease from 23.06 metric tons (mt.) in 2004 to 0 mt. reported in 2005.

TSCA Regulated Waste

For the year 2005 Southwestern reported a 100% reduction in Routine TSCA Regulated Waste with a decrease from .55 mt. in 2004 to 0 mt. reported in 2005.

Routine Sanitary Waste

For the year 2005 Southwestern reported a significant increase in Routine Sanitary Waste with an increase from 14.36 mt. in 2004 to 317.84 mt. reported in 2005.

Recycling Goal

During 2005 Southwestern recycled 100 % of its potential waste stream utilizing the following listed recycling activities:

Recycled Materials	2004 mt	2005 mt
Office/Mixed Paper	0.43	10.8
Copper	4.00	0.75
Iron/Steel	33.27	8.26
Aluminum	0.62	0
Aluminum Cans	0.03	0.05
Aqueous Parts Washer Solution	0.15	0.21
Bulk electrical oil	26.61	0.0
Toner cartridges	0.21	0.15
Batteries	6.96	0.69
Tires	0.55	2.01

Recycled Materials	2004 mt	2005 mt
Fluorescent Bulbs	0.40	0.09
Ballasts	0.01	0
Computer/Electronics	0.71	2.54
Total Recycled =	73.95	25.55

SUMMARY OF PERMITS/CLASSIFICATIONS

- Gore, Oklahoma Maintenance Facility
 - Conditionally Exempt Small Quantity Generator
- Springfield, Missouri Maintenance Facility
 - Conditionally Exempt Small Quantity Generator
- Jonesboro, Arkansas Maintenance Facility
 - Conditionally Exempt Small Quantity Generator
 - Permit #MO-G140037, Missouri Dept. of Natural Resources
NPDES Discharge Permit, Nixa Substation Oil/Water Separator
 - Permit #MO-G140036, Missouri Dept. of Natural Resources
NPDES Discharge Permit, Table Rock Substation Oil/Water Separator
 - Permit #MO-G140033, Missouri Dept. of Natural Resources
NPDES Discharge Permit, Kennett Substation Oil/Water Separator
 - Permit #MO-G140032, Missouri Dept. of Natural Resources
NPDES Discharge Permit, New Madrid Substation Oil/Water Separator

ENVIRONMENTAL PROGRAM INFORMATION

Southwestern's environmental program development and implementation is sufficiently discussed above. Southwestern does not have, and has not had, any ongoing monitoring or surveillance programs. Individual project monitoring for asbestos concerns in maintenance or construction projects have indicated asbestos fiber releases well below the permissible exposure limit, and final cleanup clearance criteria. Southwestern had no significant spills and/or releases during CY 2005. Southwestern accomplished minor substation construction during CY 2005 without adverse impacts to the environment. Southwestern did not initiate nor complete an environmental impact statement (EIS) or environmental assessment (EA) during CY 2005.

Environmental staff has trained field personnel in the techniques of conducting self-assessments. The Maintenance Division has responsibility for conducting an environmental self-assessment on an annual basis. Field crews perform bi-monthly environmental site inspections as part of routine maintenance activities. Southwestern's environmental staff has performed a system-wide Environmental Appraisal annually. These annual environmental appraisal reports and recommendations are provided to Southwestern management.

Southwestern's Environmental Management System includes a manual that outlines a systematic process that guides Southwestern activities to ensure implementation of environmental requirements and to encourage the achievement of continuous improvement. Southwestern's Policy Statement is that: "Southwestern will strive for excellence in the protection of the environment by conducting operations in a manner that meets DOE guidelines and applicable Federal, state and local environmental regulations. Southwestern will strive for continual improvement and pollution prevention. The ISO standard 14001-2005 -11-15 will be used as a guide." The Policy and Environmental Management System manual are endorsed by senior management. Aspects and Impacts have been identified for the division's activities. Legal and other requirements are compiled in a matrix. Southwestern identified objectives and targets to achieve and to meet the commitments of the Environmental Policy. Position Descriptions have been modified to reflect responsibilities to ensure Southwestern's operations are carried out consistent with guidelines and objectives of the Environmental Management System. Required training has been included in the agency training plan. Internal and External Communication is documented in an electronic Journal. Annual audits to ensure continual improvement are scheduled as well as annual Management review.

AWARDS AND RECOGNITION

Southwestern received a Citation for Merit from the State Historical Preservation Office of Oklahoma for performance in preserving Oklahoma's heritage. Southwestern was also recognized for Best Management Practice by the Pawnee Tribe for wide spread tribal consultation. Both acknowledgments were in conjunction with the programmatic agreements for cultural resource preservation.

Southwestern has no radiological source emissions and, therefore, has no radiological information to provide for this report.

-- Non-Radiological Information

Southwestern is exempt from any monitoring requirements in addition to those already discussed. Southwestern does not have any continuous release reporting requirements under CERCLA because does not store, use, or release hazardous substances in quantities equal to, or greater than their reportable quantities. In addition, Southwestern has not had any unplanned reportable releases of pollutants or hazardous substances to the environment during CY 2005.

-- Groundwater Monitoring and Protection

Southwestern does not currently have an ongoing groundwater-monitoring program. The objectives of Southwestern's Groundwater Protection Management Program for groundwater monitoring are: 1) identify existing and potential sources of groundwater contamination; and 2) establish guidelines for implementing groundwater monitoring.

Historical and current site information concerning potential groundwater contamination sources indicates that active groundwater monitoring is not warranted at this time. However, should Southwestern become aware of any information that would indicate groundwater could be adversely affected by Southwestern's activities, or if a major spill occurs and groundwater contamination is probable, then Southwestern would implement a site-specific groundwater-monitoring program at that facility. The site-specific program would consist of monitoring well siting and installation, groundwater sampling, and reporting.

-- Quality Assurance

Southwestern's Quality Assurance Program provides Headquarters and field units the capability to assure quality data is obtained during Southwestern's environmental monitoring activities. Southwestern conducts onsite audits of its analytical facilities to help ensure permits, licenses, certifications are current, applicable for required analyses. Southwestern ensures their analytical laboratories participate in inter-laboratory crosscheck programs.